

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
JOY CHEN  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 Joy\_Chen@fd.org

6 Attorney for Pablo Santiz

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 PABLO SANTIZ,

14 Defendant.  
15

Case No. 2:22-cr-00244-JCM-EJY

**STIPULATION TO VACATE  
TRIAL DATES**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting  
17 United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the  
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,  
19 Assistant Federal Public Defender, counsel for Pablo Santiz, that the calendar call currently  
20 scheduled for February 19, 2025, and the trial scheduled for February 24, 2025, be vacated.

21 The Stipulation is entered into for the following reasons:

22 1. On November 4, 2022, the government filed a four-count information charging  
23 the defendant with operating a motor vehicle while under the influence of alcohol, operating a  
24 motor vehicle with a BAC of .08 grams or higher, reckless driving, and driving without a valid  
25 driver's license. ECF No. 1.  
26

1           2.       The Court issued a bench warrant for the defendant's arrest on July 24, 2023.  
2 ECF No. 33. The warrant is still pending and the defendant's whereabouts remain unknown.

3           3.       In light of the pending warrant, the parties respectfully request that the Court  
4 vacate the current trial date of February 24, 2025. The parties further request that the Court hold  
5 off on setting a new trial date until the defendant is arrested on the pending bench warrant.

6           DATED this 27th day of January, 2025.

7           RENE L. VALLADARES  
8           Federal Public Defender

          SUE FAHAMI  
          Acting United States Attorney

9           By /s/ Joy Chen

          By /s/ Skyler Pearson

10          JOY CHEN  
          Assistant Federal Public Defender

          SKYLER PEARSON  
          Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 PABLO SANTIZ,

7 Defendant.

Case No. 2:22-cr-00244-JCM-EJY

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. On November 4, 2022, the government filed a four-count information charging  
14 the defendant with operating a motor vehicle while under the influence of alcohol, operating a  
15 motor vehicle with a BAC of .08 grams or higher, reckless driving, and driving without a valid  
16 driver's license. ECF No. 1.

17 2. The Court issued a bench warrant for the defendant's arrest on July 24, 2023.  
18 ECF No. 33. The warrant is still pending and the defendant's whereabouts remain unknown.

19 3. In light of the pending warrant, the parties respectfully request that the Court  
20 vacate the current trial date of February 24, 2025. The parties further request that the Court hold  
21 off on setting a new trial date until the defendant is arrested on the pending bench warrant.  
22  
23  
24  
25  
26

1 **CONCLUSIONS OF LAW**

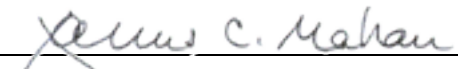
2 The ends of justice served by granting said continuance outweigh the best interest of the  
3 public and the defendant in a speedy trial, since the failure to grant said continuance would be  
4 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
5 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into  
6 account the exercise of due diligence.

7 The continuance sought herein is excludable under the Speedy Trial Act, Title 18,  
8 United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18,  
9 United States Code, § 3161(h)(7)(B)(i), (iv).

10  
11 **ORDER**

12 IT IS THEREFORE ORDERED that the calendar call currently scheduled for  
13 February 19, 2025, at the hour of 1:30 p.m., be vacated; and the trial currently scheduled for  
14 February 24, 2025, at the hour of 9:00 a.m., be vacated.

15 DATED January 29, 2025.

16   
17 \_\_\_\_\_  
18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26